



U.S. Department of Justice

United States Attorney
Southern District of New York

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

June 17, 2020

By ECF

The Honorable Paul A. Crotty
United States District Judge
Southern District of New York
500 Pearl Street, Courtroom 14C
New York, New York 10007

Re: *United States v. Joshua Adam Schulte*, S3 17 Cr. 548 (PAC)

Dear Judge Crotty:

We write to respectfully request additional time to respond to the defendant's June 15, 2020, request for records and papers used in connection with the constitution of the Master and Qualified Jury Wheels in this District. We have learned that similar motions have been made in other cases in this District. *See United States v. Balde*, No. 20 Cr. 281 (KPF); *United States v. Williams*, No. 20 Cr. 286 (WHP); *United States v. Baker*, No. 20 Cr. 288 (LJL); *United States v. Henry*, No. 20 Cr. 293 (LJL). Yesterday in *Balde*, Judge Failla issued an order granting the Government's request to speak with Linda Thomas, this District's Jury Administrator, prior to taking a position on the motion in that case, and scheduling a call with the Government, defense counsel, and Ms. Thomas for June 30, 2020, at 2:00 p.m. (*See* No. 20 Cr. 281, Dkt. 21, Exhibit A). In that order, Judge Failla also directed the Government to coordinate with counsel in "any other cases with similar motions" so that they may also participate on the call.

Accordingly, the Government respectfully requests that the Court adjourn the current June 19, 2020 response deadline so that the Government and defense counsel can participate on the call with Ms. Thomas prior to litigating the defendant's motion. If the Court grants this request, the Government respectfully requests until July 7, 2020 to file a substantive response to the defendant's motion.

6-18-2020
The extension is
granted. SO
ORDERED.

Respectfully submitted,

GEOFFREY S. BERMAN
United States Attorney

by: /s/
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cc: Defense Counsel (by ECF)